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Services, Inc., Angeles Chemical Company,
Inc., and John Locke

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

ANGELES CHEMICAL COMPANY, INC., a
California Corporation, GREVE FINANCIAL
SERVICES, INC., a California Corporation,
and JOHN LOCKE, an Individual,

Plaintiffs,

vs.

MCKESSON CORPORATION, a California
Corporation, et. al.,

Defendants.

Northern District Miscellaneous Matter No.
Case No. C 06-80343 Misc MMC (EDL)
Case No. C 07-80123 Misc MMC (EDL)

Central District of California
Case No: 01-10532 TJH (Ex)

**SUPPLEMENTAL DECLARATION OF
JEFFERY L. CAUFIELD IN SUPPORT
OF ANGELES' MOTION TO COMPEL
THELEN & REID TO PRODUCE
DOCUMENTS**

Date: October 9, 2007
Time: 9:00 a.m.
Room: E
Judge: Judge Elizabeth D. Laporte

1 I, Jeffery L. Caufield, declare as follows:

2 1. I am an attorney of record for Plaintiffs and Counter-Defendants, Greve Financial
3 Services, Inc., a California corporation, Angeles Chemical Company, Inc., a California
4 corporation, and John Locke, an individual (collectively, "Angeles") in the above entitled action.

5 2. Attached hereto as **Exhibit 1** is a true and correct copy of the December 15, 2005 Order
6 from the Honorable James W. McMahon regarding Angeles' Motion to Compel Production of
7 Documents.

8 3. Attached hereto as **Exhibit 2** is a true and correct copy of the July 30, 2003 letter from
9 Univar to Angeles.

10 4. After receiving Univar's July 30, 2003 response, Angeles followed up with multiple
11 requests for production, subpoenas and meet and confers to McKesson requesting the missing
12 "Univar" Documents.

13 5. Attached hereto as **Exhibit 3** is a true and correct copy of the February 23, 1994 letter.

14 6. On June 22, 2005 Angeles served Univar with a "Consolidated Amended Notice of
15 Request for Production of Documents And Taking of Depositions of Persons Most
16 Knowledgeable to FRCP 45 of Univar, USA, Inc." McKesson objected to the subpoena and once
17 again, Univar asserted that McKesson had all of the documents.

18 7. Angeles went back to McKesson demanding the aforementioned documents, which
19 McKesson refused to look for until early December 2005, over 4 years after the initiation of this
20 litigation.

21 8. Attached hereto as **Exhibit 4** is a true and correct copy of the January 16, 2006 letter from
22 McKesson to Angeles.

23 9. Attached hereto as **Exhibit 5** is a true and correct copy of the December 1, 2005 email
24 from Angeles to McKesson.

25 10. Attached hereto as **Exhibit 6** is a true and correct copy of the January 18, 2006 letter from
26 Angeles to McKesson.

27 11. In response to Angeles' December email, McKesson agreed to contact Univar and
28 determine whether Univar had any documents responsive to the outstanding discovery requests.

12. Attached hereto as **Exhibit 7** is a true and correct copy of the December 12, 2005 letter
from McKesson to Angeles.

1 13. Attached hereto as **Exhibit 8** is a true and correct copy of relevant pages from Squire,
2 Sanders & Dempsey LLP's Revised Privilege Log Produced on July 25, 2007.

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4 I declare under penalty of perjury that the foregoing is true and correct. Executed in San
5 Diego, California on September 25, 2007.

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7 Caufield & James, LLP

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9 _____
10 Jeffery L. Caufield, Esq.
11 Attorney for Plaintiff/Counter-Defendant
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